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10 Attorneys for Plaintiff
11 MATTHEW LAZARES

12 UNITED STATES DISTRICT COURT
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA
14 OAKLAND DIVISION

15 MATTHEW LAZARES, an individual;

16 Plaintiff,

17 vs.

18 SHOPIFY (USA), INC., a Delaware
19 corporation, and DOES 1 through 50,
20 inclusive;

21 Defendants.

Case No. 4:24-CV-07125-HSG

**JOINT STIPULATION OF DISMISSAL AND
ORDER**

Courtroom: 2 – 4th Floor

Judge: Hon. Haywood S. Gilliam, Jr.

STIPULATION OF DISMISSAL

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned, the attorneys of record for the Parties to the above-entitled action, that, pursuant to Rule 41(a) of the Federal Rules of Civil Procedure, the above-entitled action, and each and every count and claim asserted therein, is hereby dismissed with prejudice as to Plaintiff Matthew Lazares, and without prejudice as to all other individuals similarly situated. Furthermore, each party is to bear its own attorneys' fees and costs;

IT IS FURTHER HEREBY STIPULATED AND AGREED that this stipulation may be filed with the Clerk of the United States District Court for the Northern District of California, without further notice;

IT IS FURTHER HEREBY STIPULATED AND AGREED that this Court, the United States District Court for the Northern District of California, shall retain jurisdiction for the purpose of enforcing the terms of the Settlement Agreement if a dispute arises between the parties thereto.

VALLES LAW, P.C.

DATED: August 20, 2025

By: /s/ Daniel Valles

Daniel Valles

Attorneys for Plaintiff
MATTHEW LAZARES

GIBSON, DUNN & CRUTCHER LLP

DATED: August 20, 2025

By: /s/ Joseph Rose

Joseph R. Rose

Attorneys for Defendant
SHOPIFY (USA) INC.

CIVIL L.R. 5-1(i) ATTESTATION

Pursuant to Civil Local Rule 5-1(i), I, Daniel Valles, hereby attest under penalty of perjury that concurrence in the filing of this document has been obtained from all signatories.

DATED: August 20, 2025

By: /s/ Daniel Valles
Daniel Valles

ORDER

Based on the parties' stipulation, IT IS SO ORDERED. The Clerk of the Court is directed to dismiss this matter with prejudice as to Plaintiff Matthew Lazares and without prejudice as to all other individuals similarly situated. All other existing dates and deadlines are hereby vacated. This Court shall retain jurisdiction for the purpose of enforcing the terms of the Settlement Agreement if a dispute arises between the parties thereto.

IT IS SO ORDERED.

DATED: 8/21/2025


THE HONORABLE HAYWOOD S. GILLIAM, JR.
UNITED STATES DISTRICT JUDGE